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June 7, 2021

**VIA ECF**

Honorable Analisa Torres  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Timothy Shea, et al.*, 20-CR-412 (AT)**

Dear Judge Torres:

On behalf of defendant Timothy Shea in the above-captioned matter, we respectfully write to request permission for Mr. Shea to travel outside his district to attend two of his teenage son's basketball tournaments out of state. Namely, Mr. Shea requests permission to travel to Dallas, Texas from July 7<sup>th</sup> to July 12, 2021 and to Las Vegas, Nevada from July 20<sup>th</sup> to July 26, 2021. Mr. Shea would be traveling with his son and family. Mr. Shea, a Colorado resident, has been released on bail since September 2020, and has been monitored by the District of Colorado's Probation Office without any issue.

Mr. Shea's Pre-trial officer from the District of Colorado, as well as the government, do not object to this request. If approved, Mr. Shea will be providing an exact itinerary of his travel arrangements to his monitoring officer.

Thank you for your consideration of this request.

Sincerely,

/s/  
John Meringolo, Esq.